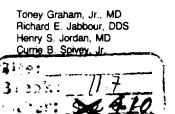
Commissioner: Michael D. Jarrett

Board: John B. Pate, MD, Chairman

William E. Applegate, III, Vice Chairman John H. Burriss, Secretary

Promoting Health, Protecting the Environment

April 23, 1991



Mr. Jon Bornholm Remedial Project Manager U.S. EPA, Region IV 345 Courtland Street Atlanta, GA 30365

RE: Medley Farms

Dear Mr. Bornholm:



This letter is to give the State's response to the Medley Farms Steering Committee's comments on the proposed plan for remediation of this site. This was submitted under a cover letter from King & Spalding dated April 12, 1991.

The Steering Committee states that site soils pose no significant risk. This statement is not substantiated by site data. The site soils present a risk of 1.62 E-5 under the future use scenario. This level is above the level of 1 E-6 clean-up standard applied by EPA Region Iv. The risk calculated by Sirrine is not conservative. The values used for exposure frequency, fraction ingested and ingestion rate in the risk calculations are low. This leads to a under estimation of risk posed by the site soils.

The Steering Committee states that VOCs detected at the site have a tendency to sorb to soils. This statement supports the fact that natural flushing will take a long time to bring concentrations of contaminants in the soils to levels were they no longer effect groundwater. By using SVE to remove the source, groundwater remediation will be shorten.

For these reasons, the State feels that SVE, along with groundwater extraction, is the most appropriate remedy for the site. If you have any questions, please call me at (803)734-5487.

Sincerely,

Richard Haynes

Site Engineering Section

Bureau of Solid and Hazardous Waste Management

RH/njw

cc: Keith Lindler